

REMARKS

1. The Applicants gratefully acknowledge the Examiner's allowance of claims 1, 3, 4, 7, and 8 through 18.

2. The Examiner has rejected independent claim 20 under 35 U.S.C. § 102(e) as being anticipated by Bharatia et al. (U.S. Patent No. 6,615,037). In the Examiner's view, Bharatia et al. disclose a system comprising: a database located within device 14 in FIG. 1 comprising data for a plurality of devices complying with at least ANSI-41 and GSM (column 6, lines 6-7; a database comprising data for a plurality of communication devices). Furthermore, the Examiner maintains that Bharatia et al. disclose at least one protocol gateway 14 coupled to the database, said gateway including ANSI-41 and GSM protocols (column 5, lines 21-24) using one control procedure (one or more protocol gateways, coupled to the database, arranged and constructed to interpret network requests from the at least two network protocols and generate one or more queries to the database). The Applicants respectfully disagree with this assessment of Bharatia et al.

In the Applicants' view, the gateway 14 of FIG. 1 simply resides between "master" and "slave" networks, and is utilized to convert a request from a slave network (GSM) to a master network (ANSI41). All users (under the slave as well as the master network) are managed by the HLR of the master network (the ANSI-41 HLR in Bharatia et al.). The gateway 14 merely performs protocol conversion from a slave protocol to a master protocol using a data conversion table stored in the gateway database.

As set forth in Applicants' claim 20 ("utilizing common control procedures for the at least two networks"), the present invention converts requests from individual protocols into an

internal common language to access the common subscriber database, while gateway 14 of Bharatia et al. simply performs protocol conversion from slave to master toward the master HLR. The database of the present invention is clearly the common subscriber database for multiple protocols, while the database of gateway 14 is just for protocol conversion. The main subscriber service database is still in the master HLR in ANSI-41 format.

For the reasons set forth above, the Applicants respectfully submit that claim 20 is patentably distinguishable over the prior art of record, and is thus in condition for allowance. Claims 21 through 33 depend ultimately from claim 20, which has been shown to be allowable above. Consequently, claims 21 through 33 should also be passed to issuance.

3. The Examiner has objected to claims 38-40 as being dependent upon a rejected base claim, noting that the subject matter of these claims would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claim.

Accordingly, claim 34 has been amended to incorporate the subject matter of claim 35 (an intervening claim) and claim 38. Claims 35 and 38 have been canceled, while claims 36, 37, and 39 have been amended merely to change their dependencies. The Applicants respectfully submit that amended claim 34 is now in condition for allowance, as are claims 36, 37, 39, and 40, which depend therefrom.

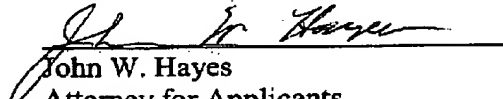
4. The Applicants respectfully submit that claims 20 through 33, 34, 36, 37, 39, and 40 are in condition for allowance, as are previously allowed claims 1, 3, 4, 7, and 8 through 18. Allowance of all claims pending is therefore respectfully requested. If a telephone conference

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would be of assistance in advancing the prosecution of this application, the Examiner is invited to call Applicants' attorney.

Respectfully submitted,


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